

STATE OF ILLINOIS

JAN 23 1 22 PM '02

ILLINOIS COMMERCE COMMISSION

CHIEF CLERK'S OFFICE

Illinois Bell Telephone Company	)	
	)	98-0252
Application for Review of Alternative Regulation Plan	)	(consol.)
	)	
Illinois Bell Telephone Company	)	
	)	98-0335
Petition to Rebalance Illinois Bell Telephone Company's	)	(consol.)
Carrier Access and Network Access Line Rates	)	
	)	
Citizens Utility Board and the People of the State	)	
of Illinois	)	
vs.	)	00-0764
Illinois Bell Telephone Co., d/b/a Ameritech, Illinois	)	(consol.)
	)	
Petition for reduction in rates and other relief	)	

**PEOPLE OF THE STATE OF ILLINOIS'**  
**ISSUE LIST FOR ORAL ARGUMENT**

In response to the Notice of Oral Argument as amended in the Notice Regarding Oral Argument, the People of the State of Illinois, by James E. Ryan, Attorney General, submit the following issues. In light of the short period of time of provided to prepare this issues list, and the lapse of time since the case was fully briefed, and partially briefed, this issues list is necessarily broad, and may be refined before oral argument is presented.

Following the Table of Contents that outlines the final PEPO as directed in the Notice of Oral Argument, the People of the State of Illinois intend to address the following areas in oral argument:

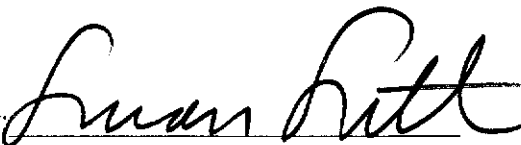
- I. Introduction and Background, including purpose of this review proceeding
- II. The 10 Point Review, including why the Commission required these issues to be specifically addressed, an assessment of the productivity factor; AI's investment in infrastructure; report of price changes; reclassification of services as competitive; new services; and universal service levels.
- III. Statutory Criteria
  - 1. Just and reasonable rates - legal and regulatory principles that define just and reasonable rates
  - 4, 8. Did the Plan respond to changes actually occurring? The existence and role of competition
  - 10. Public interest
- V. Going Forward
  - B. 2. X Factor
  - E. Baskets (respond to other parties, if necessary)
  - F. Reinitialization of APC & PCI and relation to rate reinitialization
- VI. Rate Reinitialization
  - A. 4. Rate design
  - B. Positions on the Central Issue

Assistant Attorney General Susan L. Satter will address the above issues on behalf of the People of the State of Illinois, and will work with the Citizens Utility Board, the City of Chicago and the Cook County State's Attorney's Office to attempt to minimize or eliminate repetition in

the arguments presented. Further, the People have no objection to the Commissioners interrupting oral argument to ask questions or comment on argument, as is customary in the Illinois appellate courts.

The People of the State  
Respectfully submitted:

THE PEOPLE OF THE STATE OF ILLINOIS  
James E. Ryan, Attorney General

By 

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January 22, 2002

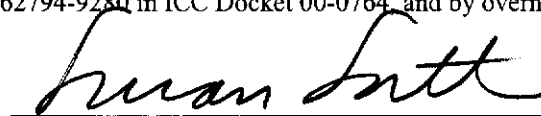
STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Bell Telephone Company	)	
	)	
Application for Review of Alternative	)	Docket No. 98-0252
Regulation Plan	)	
Petition to Rebalance Illinois Bell	)	
Telephone Company's Carrier Access and	)	Docket No. 98-0335
Network Access Line Rates	)	
Citizens Utility Board and People of the	)	
State of Illinois, ex rel. James E. Ryan,	)	
Attorney General of the State of Illinois,	)	
Complainants	)	
	)	
vs.	)	Docket No. 00-0764
	)	
Illinois Bell Telephone Company d/b/a	)	
Ameritech Illinois,	)	(consolidated)
Respondent	)	

**NOTICE OF FILING**

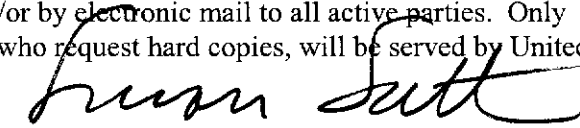
**PLEASE TAKE NOTICE** that on this date January 22, 2002, we filed with the Chief Clerk of the Illinois Commerce Commission the enclosed People of the State of Illinois' Issue List for Oral Argument in the above-captioned docket by via e-docket to the Chief Clerk of the Illinois Commerce Commission at 527 East Capitol Avenue, Springfield, Illinois 62794-9280 in ICC Docket 00-0764, and by overnight delivery in ICC Dockets 98-0252 and 98-0335.



Susan L. Satter  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I, Susan L. Satter, an Assistant Attorney General, hereby certify that caused to be served the above identified documents upon all active parties of record on the attached service list by United States Mail, first class postage prepaid on January 22, 2002, and/or by electronic mail to all active parties. Only parties whose e-mail transmissions are not effective, or who request hard copies, will be served by United States Mail.



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